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September 19, 2022

**APPLICATION GRANTED**

**SO ORDERED** 

**VERNON S. BRODERICK**

**U.S.D.J.** 09/20/2022

Via ECF

Hon. Vernon S. Broderick, USDJ  
United States District Court, SDNY  
40 Foley Square  
New York, NY 10007

Any opposition by Plaintiffs is due on or before  
October 11, 2022. Any reply by Defendants is  
now due on or before October 18, 2022.

**Re: Gumaneh et al v. Vilano Employment Services, Inc. et al**

**Case No. 22-CV-00774 (VSB)(KHP)**

**Renewed Motion for Extension of Time**

Dear Judge Broderick:

My firm represents plaintiffs in the above-referenced action, and I respectfully make this renewed request for a brief two-week extension of time consistent with this Court's September 16, 2022, order. Since said order, Defendants have indicated that they will not consent to the request but have not provided a reason. This request is being made because some additional time is needed to confer with Plaintiffs whose first language is not English, and workload demands – Plaintiffs' counsel has just finished briefing a major appeal and several major motions and has numerous mediations and related matters in the coming weeks.

The original due date for Plaintiffs' opposition under the local rules is September 27, 2022 – 14 days from the date of the motion which was filed on September 13, 2022 – and maybe a few extra days based on the type of service. However, Plaintiffs only request a brief two-week extension from the September 27, 2022 date – which would make the new deadline for Plaintiffs' opposition October 11, 2022. The Court can make a corresponding extension of Defendants time to reply, if any. One prior request for an extension of this deadline was made and denied without prejudice to refile with the information now included.

I thank the Court in advance for its time and consideration.

Respectfully submitted,

Abdul Hassan Law Group, PLLC

/s/ Abdul Hassan  
By: Abdul K. Hassan, Esq. (AH6510)  
*Counsel for Plaintiffs*

**Cc: Defense Counsel via ECF**